

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

BORIS BRYANT, ET AL.

Plaintiffs,

v.

FMC TECHNOLOGIES, ET AL.

Defendants.

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CIVIL ACTION NO: 4:08-cv-03744

**DEFENDANT’S JOINDER IN MOTION FOR SEPARATE TRIALS**

Defendant, Dobbs Temporary Services, Inc. d/b/a Pro Staff Personnel Services, improperly named as Pro Staff Personnel Acquisition Corp. (“Pro Staff”), joins in Defendant FMC Technologies, Inc.’s (“FMCTI”) Motion for Separate Trials, as follows:

1. For the reasons expressed in FMCTI’s motion, and subject to Pro Staff’s summary judgment motion, Pro Staff joins in the relief requested.
2. In addition, only eight of the twelve plaintiffs have brought claims against Pro Staff. For some claims, such as their Title VII race and retaliation claims, only *three* plaintiffs have sued Pro Staff. Absent separate trials, Pro Staff will be forced to defend against a case in which – at least for some claims – the overwhelmingly majority of plaintiffs have not even sued it.
3. Finally, in regards to Plaintiffs Darren Mayo (who has not even sued Pro Staff) and John Lucas, the evidence is uncontroverted that Pro Staff played no role in their terminations from FMC. Thus, it will be on the sidelines for this portion of the trial. Similarly, it will be on the sidelines for those portions of the trial that deal with the other three plaintiffs who have not brought *any* claims against Pro Staff – Lawrence Grice, Boris Bryant, and Lamar Newton.

Respectfully submitted,

By: /s/ W. Jackson Wisdom

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**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of Defendant Pro Staff's Joinder in Motion for Separate Trials has been forwarded via e-filing in compliance with Rule 5 of the Federal Rules of Civil Procedure on July 14, 2010 to:

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Mr. Steven L. Robinson  
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